

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Fitchburg Gas and Electric Light Company) D.T.E. 99-118

ASSENTED-TO MOTION
TO MODIFY PROCEDURAL SCHEDULE

Now comes Fitchburg Gas and Electric Light Company ("FG&E") and moves the Department of Telecommunications and Energy ("Department") to modify the procedural schedule in the above referenced proceeding. FG&E represents that the Office of the Attorney General of the Commonwealth ("Attorney General") assents to this motion. On March 13, 2001, the Department issued an Interlocutory Order Regarding Scope of Proceeding and Motion to Compel Discovery in the above-captioned matter. In that Order, the Department granted in part, and denied in part, the Attorney General's Motion to Compel certain responses to information requests to which FG&E had objected. Specifically, the Department ordered FG&E to respond to the Attorney General's information requests AG-2-6 through AG-2-13, and to submit such responses within five (5) business days of the Interlocutory Order.

The Company has prepared and submitted the responses to AG-2-7, 2-10, 2-11, 2-12 and 2-13. On March 20, 2001, the Company filed, and was granted, a request for a three day extension for responding to the remaining interrogatories (AG-2-6, 8 and 9), which request was assented to by the Attorney General. In recognition of the fact that the disputes over these responses have delayed the Attorney General's receipt of this information as envisioned in the original procedural schedule, FG&E, with the assent of the Attorney General, seeks the following modifications to the procedural schedule.

FG&E to respond to AG-2-6, 2-8 and 2-9 March 23, 2001

AG to issue follow up discovery on
responses to AG-2-6 through 13 March 27, 2001

FG&E to respond to follow up discovery April 3, 2001

AG to submit supplemental testimony April 18, 2001

FG&E to submit supplemental testimony May 2, 2001

Evidentiary Hearings May 14, 16 and 18

The parties believe that this revised schedule will provide a greater opportunity for development of the record and the Department's review of this matter.

WHEREFORE, for all the reasons stated herein, Fitchburg Gas and Electric Light Company respectfully requests that the Department of Telecommunications and Energy grant its request to modify the procedural schedule as set forth herein.

Respectfully submitted,

Fitchburg Gas and Electric Light Company

By its attorneys,

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Dated: March 21, 2001

CERTIFICATION

I, Scott J. Mueller, certify that I have, this ____ day of March, 2001, served a copy of the within Motion of Fitchburg Gas and Electric Light Company for Extension on each of the individuals on the service list on file with the Secretary of the Department of Telecommunications and Energy.

Dated at Boston, Massachusetts, this 21st day of March, 2001.

Scott J. Mueller